

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**ChromaSource, Inc.
2401 S. 600 East
Columbia City, Indiana 46725**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F183-14489-00033	
Original signed by Paul Dubenetzky Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 19, 2001 Expiration Date: October 19, 2006

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary coated and laminated paper color sample manufacturing source.

Authorized individual:	Steven A. Scherf, Technical Director
Source Address:	2401 S. 600 East, Columbia City, IN 46725
Mailing Address:	2401 S. 600 East, Columbia City, IN 46725
SIC Code:	2672
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) paper coating line, identified as CSI - Coater #1, using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with a catalytic oxidizer, identified as Oxidizer #1, for VOC control, exhausting through one (1) stack (ID No. 1);
- (b) One (1) paper coating line, identified as CSI - Coater #2, using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with a catalytic oxidizer, identified as Oxidizer #2, for VOC control, exhausting through one (1) stack (ID No. 2);
- (c) One (1) paper coating line, identified as CSI - Coater #3, using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with a catalytic oxidizer, identified as Oxidizer #2, for VOC control, exhausting through one (1) stack (ID No. 2);
- (d) One (1) catalytic oxidizer, identified as Oxidizer #1, with a maximum rated heat input capacity of 13.6 million (MM) British thermal units per hour (Btu), including natural gas and solvents, controlling VOC emissions from one (1) paper coating line (CSI - Coater #1) and a container cleaning operation (CSI - Container Cleaner #1), exhausting through one (1) stack (ID No. 1);
- (e) One (1) catalytic oxidizer, identified as Oxidizer #2, with a maximum rated heat input capacity of 13.6 million (MM) British thermal units per hour (Btu), including natural gas and solvents, controlling VOC emissions from two (2) paper coating lines (CSI - Coater #2

- (f) and CSI - Coater #3), exhausting through one (1) stack (ID No. 2); and
One (1) container cleaning operation, identified as CSI - Container Cleaner #1, where empty paint containers are sprayed with cleaning solvent and manually cleaned with a brush, using a maximum of 5 pounds per hour of cleaning solvent, with a catalytic oxidizer, identified as Oxidizer #1, for VOC control, exhausting through one (1) stack (ID No. 1).

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
 - (1) Two (2) boilers, rated at 1.87 and 3.34 MMBtu/hr; and
 - (2) Three (3) dryers, identified as Dryer #1, Dryer #2 and Dryer #3, each rated at 1.5 MMBtu/hr;
- (b) Combustion source flame safety purging on startup;
- (c) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (d) Paved and unpaved roads and parking lots with public access;
- (e) Emergency generators as follows:
 - (1) Diesel generators not exceeding 1600 horsepower;
- (f) Other emergency equipment as follows:
 - (1) Stationary fire pumps; and
- (g) Other activities or categories not previously identified:
 - (1) Paper cutting operations which cut the sheets of color samples to the proper size. These operations create small amounts of particulate matter which are swept with the paper scraps, etc. Total PM from these operations is less than the 5 lb/hr or 25 lb/day threshold.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions, is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

- (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) paper coating line, identified as CSI - Coater #1, using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with a catalytic oxidizer, identified as Oxidizer #1, for VOC control, exhausting through one (1) stack (ID No. 1);
- (b) One (1) paper coating line, identified as CSI - Coater #2, using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with a catalytic oxidizer, identified as Oxidizer #2, for VOC control, exhausting through one (1) stack (ID No. 2);
- (c) One (1) paper coating line, identified as CSI - Coater #3, using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with a catalytic oxidizer, identified as Oxidizer #2, for VOC control, exhausting through one (1) stack (ID No. 2);
- (d) One (1) catalytic oxidizer, identified as Oxidizer #1, with a maximum rated heat input capacity of 13.6 million (MM) British thermal units per hour (Btu), including natural gas and solvents, controlling VOC emissions from one (1) paper coating line (CSI - Coater #1) and a container cleaning operation (CSI - Container Cleaner #1), exhausting through one (1) stack (ID No. 1);
- (e) One (1) catalytic oxidizer, identified as Oxidizer #2, with a maximum rated heat input capacity of 13.6 million (MM) British thermal units per hour (Btu), including natural gas and solvents, controlling VOC emissions from two (2) paper coating lines (CSI - Coater #2 and CSI - Coater #3), exhausting through one (1) stack (ID No. 2); and
- (f) One (1) container cleaning operation, identified as CSI - Container Cleaner #1, where empty paint containers are sprayed with cleaning solvent and manually cleaned with a brush, using a maximum of 5 pounds per hour of cleaning solvent, with a catalytic oxidizer, identified as Oxidizer #1, for VOC control, exhausting through one (1) stack (ID No. 1).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

- D.1.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

- D.1.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.1.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.4 Volatile Organic Compound (VOC) [326 IAC 8-2-5]

- (a) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the volatile organic compound (VOC) content of coatings applied to paper in the three (3) paper coating lines (CSI - Coater #1, CSI - Coater #2 and CSI - Coater #3) by means of web coating shall be limited to 2.9 pounds VOC per gallon of coating less water delivered to the applicator at each facility.
- (b) Based upon 326 IAC 8-1-2(c)
 - (i) the overall control efficiency shall be 76.45%; and
 - (ii) the VOC content of the coating shall not exceed 20.34 pounds VOC per gallon of coating solids delivered to the applicator.
- (c) The VOC capture system shall meet the following criteria of a permanent total enclosure. Permanent total enclosure is defined as a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device:
 - (a) Any natural draft opening (NDO) shall be at least four (4) equivalent opening diameters from each VOC emitting point. NDO is any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan is installed.
 - (b) The total area of all NDOs shall not exceed five (5) percent of the surface area of the enclosure's four walls, floor, and ceiling.
 - (c) The average facial velocity (FV) of air through all NDOs shall be at least 3,600 meters per hour (200 feet per minute). The direction of air through all NDOs shall be into the enclosure.
 - (d) All access doors and windows whose areas are not included in condition (b) and are not included in the calculation in condition (c), shall be closed during routine operation of the process.
 - (e) All VOC emissions must be captured and contained for discharge through a control device.

D.1.5 FESOP Limit [326 IAC 2-8]

- (a) The VOC input to the three (3) paper coating lines (identified as CSI - Coater #1, CSI - Coater #2 and CSI - Coater #3) and the container cleaning operation (identified as CSI - Container Cleaner #1) shall not exceed 424.63 tons per twelve (12) consecutive month period, rolled on a monthly basis. This will limit source wide VOC emissions to less than 100 tons per year, respectively. Therefore, the requirements of 326 IAC 2-7 do not apply.
- (b) The single HAP input to the three (3) paper coating lines (identified as CSI - Coater #1, CSI - Coater #2 and CSI - Coater #3) and the container cleaning operation (identified as CSI - Container Cleaner #1) shall not exceed 42.46 tons per twelve (12) consecutive month period, rolled on a monthly basis. This will limit source wide single HAP emissions to less than 10 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

- (c) The total HAP input to the three (3) paper coating lines (identified as CSI - Coater #1, CSI - Coater #2 and CSI - Coater #3) and the container cleaning operation (identified as CSI - Container Cleaner #1) shall not exceed 106.16 tons per twelve (12) consecutive month period, rolled on a monthly basis. This will limit source wide total HAP emissions to less than 25 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.1.7 VOC Emissions

- (a) In order to comply with the VOC limit in Condition D.1.4, the catalytic oxidizer (Oxidizer #1) shall operate at all times that the one (1) coating line (CSI - Coater #1) and the one (1) dryer (Dryer #1) are in operation and shall maintain a minimum overall control efficiency of 76.45%.
- (b) In order to comply with the VOC limit in Condition D.1.4, the catalytic oxidizer (Oxidizer #2) shall operate at all times that the two (2) coating lines (CSI - Coater #2 and CSI - Coater #3) and the two (2) dryers (Dryer #2 and Dryer #3) are in operation and shall maintain a minimum overall control efficiency of 76.45%.

D.1.8 Testing Requirements

Within 12 months of startup, the Permittee shall perform VOC testing on the two (2) catalytic oxidizers (Oxidizer #1 and Oxidizer #2) to verify that the VOC capture system meets the criteria of a permanent total enclosure and that the catalytic oxidizer is maintaining a minimum control efficiency of 76.45% to show compliance with conditions D.1.4 and D.1.5, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.1.9 Volatile Organic Compounds

Compliance with the VOC content and usage limitations contained in Conditions D.1.4 and D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. However, IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.10 VOC and HAP Emissions

- (a) Compliance with Condition D.1.5 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage, single HAP and total HAP for the most recent twelve (12) month period.
- (b) Compliance with D.1.5 shall be determined using the following equation for VOC and HAP usage: $\text{VOC, HAP usage} = [(\text{VOC, HAP input}) \times \text{control efficiency}]$

D.1.11 Catalytic Oxidizers

- (a) When operating the one (1) paper coating line (CSI - Coater #1), the one (1) catalytic oxidizer (Oxidizer #1) shall maintain a minimum operating temperature of 550 F or a temperature determined in the most recent compliance stack tests to maintain at least 76.45% overall control efficiency.

- (b) When operating the two (2) paper coating lines (CSI - Coater #2 and CSI - Coater #3), the one (1) catalytic oxidizer (Oxidizer #2) shall maintain a minimum operating temperature of 550 F or a temperature determined in the most recent compliance stack tests to maintain at least 76.45% overall control efficiency.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.12 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.13 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.4 and D.1.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP (single and total) usage limits and/or the VOC emission limits established in Conditions D.1.4 and D.1.5.
 - (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The total VOC usage for each month and the weight of VOCs emitted for each compliance period;
 - (4) The total HAP usage for each month and the weight of single and total HAPs emitted for each compliance period;
 - (5) The continuous temperature records for the catalytic incinerator and the temperature used to demonstrate compliance during the most recent compliance stack test; and
 - (6) Weekly records of the duct pressure or fan amperage.
- (b) To document compliance with Condition D.1.14, the Permittee shall maintain the following records:
 - (1) The following operational parameters of the VOC emission control equipment:
 - (a) Temperature readings.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
- (1) Two (2) boilers, rated at 1.87 and 3.34 MMBtu/hr; and
 - (2) Three (3) dryers, identified as Dryer #1, Dryer #2 and Dryer #3, each rated at 1.5 MMBtu/hr.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Boilers

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-4(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 1.87 MMBtu/hr boiler and the 3.34 MMBtu/hr boiler shall be limited to 0.6 lb/MMBtu heat input.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: ChromaSource, Inc.
Source Address: 2401 S. 600 East, Columbia City, IN 46725
Mailing Address: 2401 S. 600 East, Columbia City, IN 46725
FESOP No.: F183-14489-00033

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- ☒ Annual Compliance Certification Letter
- ☐ Test Result (specify) _____
- ☐ Report (specify) _____
- ☐ Notification (specify) _____
- ☐ Affidavit (specify) _____
- ☐ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: ChromaSource, Inc.
Source Address: 2401 S. 600 East, Columbia City, IN 46725
Mailing Address: 2401 S. 600 East, Columbia City, IN 46725
FESOP No.: F183-14489-00033

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: ChromaSource, Inc.
Source Address: 2401 S. 600 East, Columbia City, IN 46725
Mailing Address: 2401 S. 600 East, Columbia City, IN 46725
FESOP No.: F183-14489-00033
Facility: CSI Coater #1, CSI Coater #2, CSI Coater #3 and CSI - Container Cleaner #1
Parameter: VOC, single HAP and total HAP
Limit: VOC emissions not to exceed 100 tons per twelve (12) consecutive month period rolled on a monthly basis, single HAP emissions not to exceed 10 tons per twelve (12) consecutive month period, rolled on a monthly basis and total HAP emissions not to exceed 25 tons per twelve (12) consecutive month period, rolled on a monthly basis.

YEAR: _____

Month	Total Usage This Month (tons)			Total Usage Previous 11 Months (tons)			Total Usage 12 Months (tons)		
	VOC	Single HAP	Total HAPs	VOC	Single HAP	Total HAPs	VOC	Single HAP	Total HAPs
Month 1									
Month 2									
Month 3									

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: ChromaSource, Inc.
Source Address: 2401 S. 600 East, Columbia City, IN 46725
Mailing Address: 2401 S. 600 East, Columbia City, IN 46725
FESOP No.: F183-14489-00033

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Mail to: Permit Administration & Development Section
Office Of Air Quality
100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

ChromaSource, Inc.
2401 S. 600 East
Columbia City, Indiana 46725

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make
these representations on behalf of _____.
(Company Name)
4. I hereby certify that ChromaSource, Inc., 2401 S. 600 East, Columbia City, Indiana, 46725, completed construction of CSI - Coater #1, CSI - Coater #2, CSI - Coater #3, CSI - Container Cleaner #1, Oxidizer #1, Oxidizer #2, the two (2) boilers, Dryer #1, Dryer #2 and Dryer #3 on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on June 13, 2001 and as permitted pursuant to **FESOP Permit No. F-183-14489, Plant ID No. 183-00033** issued on _____.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of
Indiana on this _____ day of _____, 20 _____.
My Commission expires: _____

Signature

Name (typed or printed)

**Indiana Department of Environmental Management
Office of Air Quality**

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit
(FESOP)

**ChromaSource, Inc.
2401 S. 600 East, Columbia City, IN 46725**

F-183-14489, Plt ID-183-00033

On September 8, 2001, the Office of Air Quality (OAQ) had a notice published in the Post & Mail, Columbia City, Indiana, stating that ChromaSource, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a stationary coated and laminated paper color sample manufacturing source. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit:

1. Since this is a newly constructed facility, testing shall be required within 12 months of startup, and Condition D.1.10 (Testing Requirements) (now re-numbered D.1.8) is revised as follows:

D.1.10 Testing Requirements

~~During the period between 24 and 36 months after issuance of this permit~~ **Within 12 months of startup**, the Permittee shall perform VOC testing on the two (2) catalytic oxidizers (Oxidizer #1 and Oxidizer #2) to verify that the VOC capture system meets the criteria of a permanent total enclosure and that the catalytic oxidizer is maintaining a minimum control efficiency of 76.45% to show compliance with conditions D.1.4 and D.1.5, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

On October 4, 2001, David Hughes, P.E. consultant for ChromaSource, Inc. submitted comments on the proposed FESOP. The summary of the comments is as follows:

Comment 1

Condition C.14 requires that an Emergency Reduction Plan be prepared pursuant to 326 IAC 1-5-2. 326 IAC 1-5-2 states "All persons responsible for the operation of a source that has the potential to emit one hundred (100) ton per year, or more of any pollutant shall prepare, and submit to the commissioner, for approval, written emergency reduction plans". ChromaSource is limited by this permit to less than 100 tons per year of any pollutant, so this regulation does not apply. It is not clear from the wording of Condition C.14 that this permit does not require the emergency reduction plan regardless of the applicability provisions in the regulation. Condition C.15 for Risk Management Plans specifically states that "If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR is an applicable requirement and the Permittee shall....". I am requesting that either the Emergency Reduction Plan condition be removed, since it does not apply, or a statement similar to that in C.15 be included in C.14 to clarify that it only applies if threshold levels are exceeded.

Response 1

Condition C.14 (Emergency Reduction Plans) is not required because PM emissions are not greater than 100 tons per year. Condition C.14 will be deleted and the rest of Section C will be re-numbered accordingly.

Comment 2

Conditions D.1.6 and D.1.7 address the Container Cleaner #1 as a cold cleaner degreasing operation. Container Clean #1 removes paint residue for paint containers and is not a degreaser. 326 IAC 1-2-18.5 defines Cold Cleaner Degreaser as "a tank containing organic solvent at a temperature below the boiling point of the solvent which is used to spray, brush or immerse an article for the purpose of cleaning or degreasing the article." This operation does not meet that definition. Therefore, 326 IAC 8-3-2 and 8-3-5 do not apply, and Conditions D.1.6 and D.1.7 should be removed.

Response 2

The Container Cleaner #1 does not meet the definition of 326 IAC 1-2-18.5 because it is not a tank and thus 326 IAC 8-3-2 and 326 IAC 8-3-5 are not applicable. Conditions D.1.6 and D.1.7 have been removed from the permit. The rest of Section D.1 has been re-numbered accordingly.

~~D.1.6 Volatile Organic Compounds (VOG)~~

~~Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of a cold cleaning facility (identified as CSI - Container Cleaner #1) shall:~~

- ~~(1) Equip the cleaner with a cover;~~
- ~~(2) Equip the cleaner with a facility for draining cleaned parts;~~
- ~~(3) Close the degreaser cover whenever parts are not being handled in the cleaner;~~
- ~~(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;~~
- ~~(5) Provide a permanent, conspicuous label summarizing the operating requirements;~~
- ~~(6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.~~

~~D.1.7 Volatile Organic Compounds (VOG)~~

~~(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility (identified as CSI - Container Cleaner #1) shall ensure that the following control equipment requirements are met:~~

- ~~(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:~~
 - ~~(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));~~
 - ~~(B) The solvent is agitated; or~~

- _____ (C) _____ The solvent is heated.
- _____ (2) _____ Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- _____ (3) _____ Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b):
- _____ (4) _____ The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- _____ (5) _____ Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

 - _____ (A) _____ A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - _____ (B) _____ A water cover when solvent is used is insoluble in, and heavier than, water.
 - _____ (C) _____ Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- _____ (b) _____ Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

 - _____ (1) _____ Close the cover whenever articles are not being handled in the degreaser.
 - _____ (2) _____ Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - _____ (3) _____ Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Comment 3

Condition D.1.14(b) requires that either the duct pressure or the fan amperage be observed at least once per week when the catalytic oxidizers are in operation. It further requires that the pressure or amperage be maintained as established in the most recent compliance stack test. The fans on this operation are variable speed and will automatically adjust to maintain proper destruction temperatures. Therefore, pressures and amperages will vary, and a single amperage or pressure will not be indicative of proper operation. This same issue was addressed when the FESOP F003-9663-00240 was issued for the operation of this equipment at its current location in Fort Wayne. A copy of the addendum to the TSD from that permit has been attached. For the same reasons, we ask that Condition D.1.14(b) be removed from this permit, and only temperature be used for parametric monitoring.

Response 3

Condition D.1.14(b) (now re-numbered D.1.12(b)) has been removed from the permit.

D.1.142 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.
- ~~(b) The duct pressure or fan amperage shall be observed at least once per week when the catalytic oxidizer is in operation. This pressure or amperage shall be maintained as established in the most recent compliance stack test.~~
- (eb) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for New Source Construction and a Federally Enforceable Operating Permit (FESOP)

Source Background and Description

Source Name:	ChromaSource, Inc.
Source Location:	2401 S. 600 East, Columbia City, IN 46725
County:	Whitley
SIC Code:	2672
Operation Permit No.:	F183-14489-00033
Permit Reviewer:	NH/EVP

The Office of Air Quality (OAQ) has reviewed a FESOP application from ChromaSource Inc. relating to the construction and operation of a stationary coated and laminated paper color sample manufacturing source.

History

ChromaSource, Inc. submitted an application on June 13, 2001 for the construction and operation of a new source to be located at 2401 S. 600 East, Columbia City, Indiana. ChromaSource, Inc. currently operates a similar source at Suite 1206, International Park, 2701 South Coliseum Boulevard, Fort Wayne, Indiana. This source is operating under existing FESOP No. F003-9663-00240 issued on August 19, 1998.

The new source to be located at Columbia City will initially have one new painting line. Then the two existing painting lines from the Fort Wayne source will be moved to the new source at Columbia City, one at a time. The construction and operation will be timed such that there can always be at least two lines in operation until all three are operational in the spring of 2002. This approval reflects all three coating lines at the new Columbia City location.

Permitted Emission Units and Pollution Control Equipment

This is a first time approval and no previous permits, registrations, modifications or exemptions have been issued to the source.

New Emission Units and Pollution Control Equipment

The application includes information relating to the approval for the construction and operation of the following equipment:

- (a) One (1) paper coating line, identified as CSI - Coater #1, using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with a catalytic oxidizer, identified as Oxidizer #1, for VOC control, exhausting through one (1) stack (ID No. 1);

- (b) One (1) paper coating line, identified as CSI - Coater #2, using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with a catalytic oxidizer, identified as Oxidizer #2, for VOC control, exhausting through one (1) stack (ID No. 2);
- (c) One (1) paper coating line, identified as CSI - Coater #3, using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with a catalytic oxidizer, identified as Oxidizer #2, for VOC control, exhausting through one (1) stack (ID No. 2);
- (d) One (1) catalytic oxidizer, identified as Oxidizer #1, with a maximum rated heat input capacity of 13.6 million (MM) British thermal units per hour (Btu), including natural gas and solvents, controlling VOC emissions from one (1) paper coating line (CSI - Coater #1) and a container cleaning operation (CSI - Container Cleaner #1), exhausting through one (1) stack (ID No. 1);
- (e) One (1) catalytic oxidizer, identified as Oxidizer #2, with a maximum rated heat input capacity of 13.6 million (MM) British thermal units per hour (Btu), including natural gas and solvents, controlling VOC emissions from two (2) paper coating lines (CSI - Coater #2 and CSI - Coater #3), exhausting through one (1) stack (ID No. 2); and
- (f) One (1) container cleaning operation, identified as CSI - Container Cleaner #1, where empty paint containers are sprayed with cleaning solvent and manually cleaned with a brush, using a maximum of 5 pounds per hour of cleaning solvent, with a catalytic oxidizer, identified as Oxidizer #1, for VOC control, exhausting through one (1) stack (ID No. 1).

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
 - (1) Two (2) boilers, rated at 1.87 and 3.34 MMBtu/hr; and
 - (2) Three (3) dryers, identified as Dryer #1, Dryer #2 and Dryer #3, each rated at 1.5 MMBtu/hr;
- (b) Combustion source flame safety purging on startup;
- (c) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (d) Paved and unpaved roads and parking lots with public access;
- (e) Emergency generators as follows:
 - (1) Diesel generators not exceeding 1600 horsepower;
- (f) Other emergency equipment as follows:
 - (1) Stationary fire pumps; and

(g) Other activities or categories as follows:

- (1) Paper cutting operations which cut the sheets of color samples to the proper size. These operations create small amounts of particulate matter which are swept with the paper scraps, etc. Total PM from these operations is less than the 5 lb/hr or 25 lb/day threshold.

Existing Approvals

This new source has no existing approvals. However, since equipment is being re-located to this new source from the existing source located at Suite 1206, International Park, 2701 South Coliseum Boulevard, Fort Wayne, Indiana, similar relevant conditions from existing FESOP No. 003-9663-00240, issued on August 19, 1998 were incorporated into this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on June 13, 2001.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 6).

Potential To Emit for the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.31
PM-10	1.23
SO ₂	0.10
VOC	3499.66
CO	13.58
NO _x	16.17

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Ethylbenzene	77.55
Xylene	375.83
Toluene	1283.21
Methyl Ethyl Ketone	340.04
TOTAL	2076.63

- (a) The potential to emit (PTE, as defined in 326 IAC 2-1.1-1(16)), volatile organic compounds (VOC) is greater than 25 tons per year for each pollutant. Therefore, pursuant to 326 IAC 2-5.1-3, a construction permit is required.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1) of the combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, pursuant to 326 IAC 2-5.1-3, a construction permit is required.
- (c) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (d) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (e) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.
- (f) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

	Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
CSI - Coater #1, CSI - Coater #2 and CSI - Coater #3	--	--	--	26.82	--	--	9.90	16.02
CSI - Container Cleaner #11	--	--	--	1.10	--	--		
Insignificant Activities (natural gas combustion)	0.31	1.23	0.10	0.89	13.58	16.17	--	--
Total Emissions	0.31	1.23	0.10	28.81	13.58	16.17	< 10	< 25

County Attainment Status

The source is located in Whitley County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Whitley County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 61, and 326 IAC 20 and 40 CFR Part 63) applicable to this source.
- (c) The one (1) container cleaning operation, identified as CSI - Container Cleaner #1 is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T because it does not use any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it will limit annual VOC emissions to less than the one hundred (100) tons per year rule applicability threshold for Whitley County.

326 IAC 2-8 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the usage of VOC, any single HAP, and total HAPs in the three (3) paper coating lines (identified as CSI - Coater #1, CSI - Coater #2 and CSI - Coater #3) and the container cleaning operation (identified as CSI - Container Cleaner #1) shall be limited to less than 424.63, 42.46 and 106.16 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. This will limit source wide VOC, single HAP and total HAPs emissions to less than 100, 10 and 25 tons per year, respectively. Therefore, the requirements of 326 IAC 2-7 do not apply.

The source shall comply with this requirement by operating the catalytic oxidizers (Oxidizer #1 and Oxidizer #2) at all times that the facilities are in operation.

326 IAC 5-1 (Visible Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of the three (3) paper coating lines (identified as CSI - Coater #1, CSI - Coater #2 and CSI - Coater #3) is not subject to 326 IAC 2-4.1-1 (New Source Toxic Control) because the source will limit single HAP usage to less than 10 tons per year and total HAP usage to less than 25 tons per year.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating), indirect heating units which have 10 MMBtu/hr or less and which began operation after September 21, 1983, shall in no case exceed 0.6 lb/MMBtu heat input.

This limitation is based on the lesser of the following equation or 0.6 lb/MMBtu:

$$Pt = 1.09/Q^{0.26}$$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input
Q = total source max. indirect heater input = 1.87 + 3.34 = 5.21 MMBtu/hr

$$Pt = 1.09/5.21^{0.26} = 0.71 \text{ lbs PM/MMBtu}$$

Therefore, the PM emissions from the two (2) boilers, rated at 1.87 and 3.34 MMBtu per hour heat input shall be limited to 0.6 pounds per MMBtu heat input.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The container cleaning operation, identified as CSI - Container Cleaner #1, is not subject to the requirements of 326 IAC 8-1-6 because it has potential VOC emissions less than 25 tons per year. Although not subject to the requirements of this rule, the source will exhaust process emissions to the catalytic oxidizer (Oxidizer #1) to reduce VOC emitted from this process.

326 IAC 8-2-5 (Paper Coating Operations)

- (a) The one (1) paper coating line, identified as CSI - Coater #1, is subject to the requirements of 326 IAC 8-2-5. Pursuant to this rule, the volatile organic compound (VOC) content of coating delivered to the coating applicator from a paper coating line shall be limited to 2.9 pounds of VOCs per gallon of coating excluding water.

The worst case coating that will be used in the one (1) paper coating line contains 5.29 pounds of VOC per gallon of coating less water, which exceeds the limit of 2.9 pounds of VOC per gallon of coating less water. However, the source will use the catalytic oxidizer (Oxidizer #1) to control VOC emissions in order to achieve this emission limitation.

Pursuant to 326 IAC 8-1-2(b), for surface coating operations using one of the compliance methods under 326 IAC 8-1-2(a), which in this case, is the use of the catalytic oxidizer, the equivalent emission limit in pounds of VOC per gallon of coating solids is determined using the following equation:

$$E = L / (1 - (L/D))$$

where: L = Applicable emission limit in pounds of VOC per gallon of coating
= 2.9 pounds VOC per gallon of coating less water
D = Density of VOC in coating in pounds per gallon of VOC
= 7.36 pounds of VOC per gallon of coating (from 326 IAC 8-1-2(b))
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied
= 4.79 pounds VOC per gallon of coating solids

Pursuant to 326 IAC 8-1-2(c), the equivalent overall control efficiency of the capture system and control device, as a percentage, needed in order to meet the emission limitation is determined by the following equation:

$$O = ((V-E)/V)*100$$

where: V = the actual VOC content of the coating in pounds of VOC per gallon of coating solids as applied
= 20.34 pounds VOC per gallon of coating solids
E = 4.79 pounds VOC per gallon of coating solids
O = Equivalent overall control efficiency of the capture system and control device as a percentage
= 76.45%

The VOC capture system for the one (1) coating line (CSI - Coater #1) meets the criteria for permanent total enclosure, therefore, the capture efficiency is 100%. The catalytic oxidizer (Oxidizer #1) control efficiency is 95%.

The CSI - Coater #1 is in compliance with the emission limit of 2.9 pounds VOC per gallon of coating less water under 326 IAC 8-2-5, since the catalytic oxidizer (Oxidizer #1) has an overall control efficiency of 95%, which exceeds the required control efficiency of 76.45%.

- (b) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations) the two (2) paper coating lines, identified as CSI - Coater #2 and CSI - Coater #3, are subject to the requirements of 326 IAC 8-2-5. Pursuant to this rule, the volatile organic compound (VOC) content of coating delivered to the coating applicator from a paper coating line shall be limited to 2.9 pounds of VOCs per gallon of coating excluding water.

The worst case coating that will be used in the two (2) paper coating lines, identified as CSI - Coater #2 and CSI - Coater #3, contains 5.29 pounds of VOC per gallon of coating less water, which exceeds the limit of 2.9 pounds of VOC per gallon of coating less water. However, the source will use the catalytic oxidizer (Oxidizer #2) to control VOC emissions in order to achieve this emission limitation.

Pursuant to 326 IAC 8-1-2(b), for surface coating operations using one of the compliance methods under 326 IAC 8-1-2(a), which in this case, is the use of the catalytic oxidizer, the equivalent emission limit in pounds of VOC per gallon of coating solids is determined using the following equation:

$$E = L / (1 - (L/D))$$

where: L = Applicable emission limit in pounds of VOC per gallon of coating
= 2.9 pounds VOC per gallon of coating less water
D = Density of VOC in coating in pounds per gallon of VOC
= 7.36 pounds of VOC per gallon of coating (from 326 IAC 8-1-2(b))
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied
= 4.79 pounds VOC per gallon of coating solids

Pursuant to 326 IAC 8-1-2(c), the equivalent overall control efficiency of the capture system and control device, as a percentage, needed in order to meet the emission limitation is determined by the following equation:

$$O = ((V-E)/V)*100$$

where: V = the actual VOC content of the coating in pounds of VOC per gallon of coating solids as applied
= 20.34 pounds VOC per gallon of coating solids
E = 4.79 pounds VOC per gallon of coating solids
O = Equivalent overall control efficiency of the capture system and control device as a percentage
= 76.45%

The VOC capture system for the two (2) coating lines, identified as CSI - Coater #2 and CSI - Coater #3, meets the criteria for permanent total enclosure, therefore, the capture efficiency is 100%. The catalytic oxidizer (Oxidizer #2) control efficiency is 95%.

The CSI - Coater #2 and CSI - Coater #3 are in compliance with the emission limit of 2.9 pounds VOC per gallon of coating less water under 326 IAC 8-2-5, since the catalytic oxidizer (Oxidizer #2) has an overall control efficiency of 95%, which exceeds the required control efficiency of 76.45%.

326 IAC 8-3-2 (Cold Cleaner Operation)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of a cold cleaning facility (identified as CSI - Container Cleaner #1) shall:

- (1) Equip the cleaner with a cover;
- (2) Equip the cleaner with a facility for draining cleaned parts;
- (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) Provide a permanent , conspicuous label summarizing the operating requirements;

- (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility (identified as CSI - Container Cleaner #1) shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

- (1) Close the cover whenever articles are not being handled in the degreaser.
- (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Testing Requirements

Testing is required for the control device to paper coating line CSI - Coater #1 (i.e., Oxidizer #1), and the control device to paper coating lines CSI - Coater #2 and CSI - Coater #3 (i.e., Oxidizer #2). The coatings applied at each of the three coating facilities are subject to the 2.9 pounds VOC per gallon of coating, less water, limits per 326 IAC 8-2-5. However, the source will use coatings with higher VOC contents, but will comply with the limit of 326 IAC 8-2-5 through utilization of an emissions capture system and the control devices. Such a system shall also limit source emissions of VOC, single HAP and total HAPs to less than Part 70 permitting levels of 100, 10 and 25 tons per year, respectively. To ensure compliance with these limits the source shall test the efficiency of the capture system once, and perform initial VOC testing at the catalytic oxidizers, to be reported at least once every 5 years.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The one (1) catalytic oxidizer (Oxidizer #1) for the one (1) paper coating line (identified as CSI - Coater #1) has applicable compliance monitoring conditions as specified below:

The Permittee shall record the combustion chamber temperature of the one (1) catalytic oxidizer, identified as Oxidizer #1 used in conjunction with the one (1) paper coating line (CSI - Coater #1), continuously when the one (1) paper coating line is in operation when venting to the atmosphere. Unless operated under conditions for which the Preventative Maintenance Plan specifies otherwise, the combustion chamber of the catalytic oxidizer Oxidizer #1, shall be maintained at a minimum temperature of 550° F, or a temperature established during the latest stack test, and the minimum air flow rate shall be maintained at 10,566 acfm, or an air flow rate established during the latest stack test. The Preventative Maintenance Plan for this unit shall contain troubleshooting contingency and response steps for when the temperature reading is lower than the above mentioned.

These monitoring conditions are necessary because the catalytic oxidizer for the one (1) paper coating line (CSI - Coater #1) must operate properly to ensure compliance with 326 IAC 2-8 (FESOP) and 326 IAC 8-2-5 (Paper Coating Operations).

2. The one (1) catalytic oxidizer (Oxidizer #2) for the two (2) paper coating lines (identified as CSI - Coater #2 and CSI - Coater #3) have applicable compliance monitoring conditions as specified below:

The Permittee shall record the combustion chamber temperature of the one (1) catalytic oxidizer, identified as Oxidizer #2 used in conjunction with the two (2) paper coating lines (CSI - Coater #2 and CSI - Coater #3), continuously when the two (2) paper coating lines are in operation when venting to the atmosphere. Unless operated under conditions for which the Preventative Maintenance Plan specifies otherwise, the combustion chamber of the catalytic oxidizer Oxidizer No. 2, shall be maintained at a minimum temperature of 550° F, or a temperature established during the latest stack test, and the minimum air flow rate shall be maintained at 10,566 acfm, or an air flow rate established during the latest stack test. The Preventative Maintenance Plan for this unit shall contain troubleshooting contingency and response steps for when the temperature reading is lower than the above mentioned.

These monitoring conditions are necessary because the catalytic oxidizer for the two (2) paper coating lines (CSI - Coater #2 and CSI - Coater #3) must operate properly to ensure compliance with 326 IAC 2-8 (FESOP) and 326 IAC 8-2-5 (Paper Coating Operations).

Conclusion

The construction and operation of this stationary coated and laminated paper color sample manufacturing facility shall be subject to the conditions of the attached proposed **FESOP No.:**
F183-14489-00033.

Appendix A: Emission Calculations

Company Name: ChromaSource, Inc.
Address City IN Zip: 2401 S. 600 East, Columbia City, IN 46725
FESOP: 183-14489
Plt ID: 183-00033
Reviewer: NH/EVP

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	CSI - Coaters #1, #2 and #3	CSI - Container Cleaner #1 *	Insignificant Activities	TOTAL
PM	0.00	0.00	0.31	0.31
PM10	0.00	0.00	1.23	1.23
SO2	0.00	0.00	0.10	0.10
NOx	0.00	0.00	16.17	16.17
VOC	3,476.73	22.04	0.89	3,499.66
CO	0.00	0.00	13.58	13.58
total HAPs	2,076.63	0.00	0.00	2,076.63
worst case single HAP	1,283.21	0.00	0.00	1,283.21
Total emissions based on rated capacity at 8,760 hours/year.				
Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	CSI - Coaters #1, #2 and #3	CSI - Container Cleaner #1 *	Insignificant Activities	TOTAL
PM	0.00	0.00	0.31	0.31
PM10	0.00	0.00	1.23	1.23
SO2	0.00	0.00	0.10	0.10
NOx	0.00	0.00	16.17	16.17
VOC	26.82	1.10	0.89	28.81
CO	0.00	0.00	13.58	13.58
total HAPs	16.02	0.00	0.00	16.02
worst case single HAP	9.90	0.00	0.00	9.90
Total emissions based on rated capacity at 8,760 hours/year, after control.				
from the CSI - Container Cleaner #1 are included with the single and total HAPs for				

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: ChromaSource, Inc.
Address City IN Zip: 2401 S. 600 East, Columbia City, IN 46725
FESOP: 183-14489
Pit ID: 183-00033
Reviewer: NH/EVP

Material	Process	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
CSI Color Card Lacquer NAD0351	CSI-Coater #1	9.08	58.235%	0.0%	58.2%	0.0%	26.00%	1.00000	50.000	5.29	5.29	264.39	6345.29	1158.01	0.00	20.34	100%
Generic Wash Solvent	CSI-Coater #1	6.8	100.00%	0.0%	100.0%	0.0%	0.00%	1.00000	0.030	6.80	6.80	0.20	4.90	0.89	0.00	ERR	100%

State Potential Emissions	Add worst case coating to all solvents	264.59	6350.18	1158.91	0.00
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Controlled Potential Emissions																
										Material Usage Limitation	Controlled Efficiency %	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year		
Total Controlled Potential Emissions:										15.43%	95.00%	2.04	48.99	8.94		

Note: Emissions are controlled by a catalytic oxidizer with a control efficiency of 95%

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: ChromaSource, Inc.
Address City IN Zip: 2401 S. 600 East, Columbia City, IN 46725
FESOP: 183-14489
Pit ID: 183-00033
Reviewer: NH/EVP

Material	Process	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
CSI Color Card Lacquer NAD0351	CSI-Coater #2	9.08	58.235%	0.0%	58.2%	0.0%	26.00%	1.00000	50.000	5.29	5.29	264.39	6345.29	1158.01	0.00	20.34	100%
Generic Wash Solvent	CSI-Coater #2	6.8	100.00%	0.0%	100.0%	0.0%	0.00%	1.00000	0.030	6.80	6.80	0.20	4.90	0.89	0.00	ERR	100%

State Potential Emissions	Add worst case coating to all solvents	264.59	6350.18	1158.91	0.00
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Material	Process	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
CSI Color Card Lacquer NAD0351	CSI-Coater #3	9.08	58.235%	0.0%	58.2%	0.0%	26.00%	1.00000	50.000	5.29	5.29	264.39	6345.29	1158.01	0.00	20.34	100%
Generic Wash Solvent	CSI-Coater #3	6.8	100.00%	0.0%	100.0%	0.0%	0.00%	1.00000	0.030	6.80	6.80	0.20	4.90	0.89	0.00	ERR	100%

State Potential Emissions	Add worst case coating to all solvents	264.59	6350.18	1158.91	0.00
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Total State Potential Emissions		529.18	12700.36	2317.82	0.00
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		Controlled Potential Emissions					
		Material Usage Limitation	Controlled Efficiency %	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	
Total Controlled Potential Emissions:		15.43%	95.00%	4.08	97.98	17.88	

Note: Emissions are controlled by a catalytic oxidizer with a control efficiency of 95%

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Page 4 of 6 TSD AppA

Company Name: ChromaSource, Inc.
Address City IN Zip: 2401 S. 600 East, Columbia City, IN 46725
FESOP#: 183-14489
Plt ID: 183-00033
Permit Reviewer: NH/EVP

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethylbenzene	Weight % Xylene	Weight % Toluene	Weight % Methyl Ethyl Ketone	Ethylbenzene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methyl Ethyl Ketone Emissions (ton/yr)
CSI-Coater #1											
CSI Color Card Lacquer NAD0351	9.08	1.000000	50.00	1.30%	6.30%	21.40%	5.70%	25.85	125.28	425.54	113.35
Generic Wash Solvent	6.8	1.000000	0.03	0.00%	0.00%	26.60%	0.00%	0.00	0.00	0.24	0.00
CSI-Coater #2											
CSI Color Card Lacquer NAD0351	9.08	1.000000	50.00	1.30%	6.30%	21.40%	5.70%	25.85	125.28	425.54	113.35
Generic Wash Solvent	6.8	1.000000	0.03	0.00%	0.00%	26.60%	0.00%	0.00	0.00	0.24	0.00
CSI-Coater #3											
CSI Color Lacquer NAD0351	9.08	1.000000	50.00	1.30%	6.30%	21.40%	5.70%	25.85	125.28	425.54	113.35
Generic Wash Solvent	6.8	1.000000	0.03	0.00%	0.00%	26.60%	0.00%	0.00	0.00	0.24	0.00
CSI - Container Cleaner #1											
Generic Wash Solvent	6.8	0.740000	1.00	0.00%	0.00%	26.60%	0.00%	0.00	0.00	5.86	0.00

Total State Potential Emissions	77.55	375.83	1283.21	340.04
Total Uncontrolled HAPs (tons/yr) =				2076.63

Material Usage Limitation	Control Efficiency (VOC/HAP)	Controlled Ethylbenzene Emissions	Controlled Xylene Emissions	Controlled Toluene Emissions	Controlled Methyl Ethyl Ketone Emissions
15.43%	95.00%	0.60	2.90	9.90	2.62

Total Controlled HAPs (tons/yr) = 16.02

Note: At a 15.50% annual material usage limitation, the potential single HAP emissions are limited to less than 10 tons/yr, and the total HAP emissions are limited to less than 25 tons/yr, therefore, 326 IAC 2-7 does not

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Company Name: ChromaSource, Inc.
Address City IN Zip: 2401 S. 600 East, Columbia City, IN 46725
FESOP: 183-14489
Plt ID: 183-00033
Reviewer: NH/EVP

	Controlled Potential Emissions				
	Controlled Efficiency %	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	
Total Controlled Potential Emissions:	95.00%	0.25	6.04	1.10	

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: ChromaSource, Inc.
Address City IN Zip: 2401 S. 600 East, Columbia City, IN 46725
FESOP: 183-14489
Plt ID: 183-00033
Reviewer: NH/EVP

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

36.91

323.3

Facilities	MMBtu/hr
CSI Oxidizer #1	13.6
CSI Oxidizer #2	13.6
CSI Dryer #1	1.5
CSI Dryer #2	1.5
CSI Dryer #3	1.5
Boiler	1.87
Boiler	3.34
Total	36.91

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.31	1.23	0.10	16.17	0.89	13.58

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).